

April 8, 2022

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Via SCPSC E-FILING DMS

**Re: Application of Duke Energy Carolinas, LLC for Approval of Demand-Side Management and Energy Efficiency Rider 14, Decreasing Residential Rates and Decreasing Non-Residential Rates;
Docket No. 2022-91-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 
Stephanie U. Eaton (SC Bar No. 80073)

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2022-91-E

IN RE:

CERTIFICATE OF SERVICE

Application of Duke Energy Carolinas,
LLC for Approval of Demand-Side
Management and Energy Efficiency Rider
14, Decreasing Residential Rates and
Decreasing Non-Residential Rates

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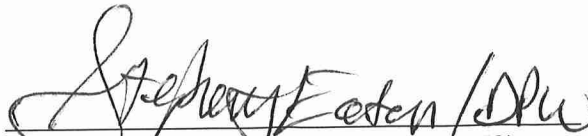
I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

Samuel J. Wellborn, Esquire
Duke Energy Carolinas, LLC
1201 Main Street, Capital Center Bldg.
Suite 1180
Columbia, SC 29201
sam.wellborn@duke-energy.com

J. Ashley Cooper, Esquire
Parker Poe Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
ashleycooper@parkerpoe.com

Christopher M. Huber, Esquire
Donna L. Rhaney, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
chuber@ors.sc.gov
drhaney@ors.sc.gov

Carri Grube-Lybarker, Esquire
Roger P. Hall, Esquire
SC Department of Consumer Affairs
293 Greystone Boulevard, Suite 400
Columbia, SC 29210
clybarker@scconsumer.gov
rhall@scconsumer.gov


Stephanie U. Eaton (SC Bar No. 80073)

Dated: April 8, 2022

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2022-91-E

IN RE:)	
)	
Application of Duke Energy Carolinas, LLC)	PETITION TO INTERVENE OF
for Approval of Demand-Side Management)	WALMART INC.
and Energy Efficiency Rider 14, Decreasing)	
Residential Rates and Decreasing Non-)	
Residential Rates)	

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On March 2, 2022, Duke Energy Carolinas, LLC ("Company" or "DEC"), filed an Application for approval of Rider 14, Demand-Side Management ("DSM") and Energy Efficiency ("EE") for 2022 ("Application"). The Application was filed pursuant to S.C. Code Ann. Section 58-37-20, S.C. Code. Ann. Regs. 103-819 and 823, the Rules of Practice and Procedure of the Public Service Commission of South Carolina.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, AR 72716.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DEC, operating approximately 30 retail stores, one distribution center, and related facilities within the DEC service territory. Collectively, these facilities consume over 97 million kWh annually from DEC. Electricity is one

of the largest operating costs faced by Walmart. As a result, any modification to DEC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. Further, Walmart is dedicated to its own investment in DSM and EE and therefore is very interested in this case and has participated in similar cases in the past.¹

4. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from DEC pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

5. The attorneys representing Walmart in this proceeding are:

Stephanie U. Eaton
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC
Phone: (336) 631-1062
Fax: (336) 725-4476
E-mail: seaton@spilmanlaw.com

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2740
Fax: (717) 795-2743
E-mail: dwilliamson@spilmanlaw.com

Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson be added jointly to the service list. Walmart may cause to be filed a motion for Mr. Williamson to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson be added to the official service list as attorneys authorized to accept service of papers in this proceeding.

6. This Petition to Intervene is timely filed as interventions are due by July 1, 2022, per Notice of the Commission.

¹ Walmart has been a party to multiple DEC DSM cases, including, most recently, Docket Nos. 2021-76-E and 2020-83-E.

WHEREFORE, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 
Stephanie U. Eaton (SC Bar No. 80073)
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
Phone: (336) 631-1062
Fax: (336) 725-4476
E-mail: seaton@spilmanlaw.com

Derrick Price Williamson
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2740
Fax: (717) 795-2743
E-mail: dwilliamson@spilmanlaw.com

Counsel to Walmart Inc.

Dated: April 8, 2022